

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

IMPLICIT, LLC,)	
)	
Plaintiff,)	Case No. 2:19-cv-00040-JRG-RSP
)	LEAD CASE
v.)	
)	Case No. 2:19-cv-00042-JRG-RSP
SOPHOS LTD.)	MEMBER CASE
)	
)	
Defendant.)	

**SOPHOS LTD.’S UNOPPOSED MOTION FOR HEARING ON MOTION TO
TRANSFER BASED ON FORUM SELECTION CLAUSE IN LICENSE AGREEMENT**

Defendant Sophos Ltd. (“Sophos”) respectfully requests a hearing on its Opposed Motion to Transfer Venue Based on Forum Selection Clause in License Agreement (Dkt. No. 66). Sophos believes that a hearing on its Motion at the Court’s earliest convenience is appropriate given the importance of the issues presented and the impact on the case schedule and jurisdiction. A hearing will also allow the parties to discuss the impact that Sophos’s motion to transfer has on its co-pending Motion to Dismiss for Lack of Personal Jurisdiction and Failure to Join a Necessary and Indispensable Party (2:19-cv-00042-JRG-RSP, Dkt. 17), which may be mooted by the outcome of the motion to transfer.

Briefing is complete on this motion, and it is ready for determination. Sophos believes a decision on this motion could result in simplification of issues as this case proceeds. Oral argument will provide the parties with the opportunity to address the issues raised and to answer any questions the Court may have. Sophos hereby requests 20 minutes per side for arguments.

Sophos has consulted with counsel for Plaintiff Implicit, LLC, who has represented that Plaintiff has no opposition to this motion.

A proposed Order is attached hereto.

August 15, 2019

Respectfully submitted,

By: /s/ Lana S. Shiferman
(with permission by Jennifer P. Ainsworth)

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Counsel for Sophos Ltd.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on January 11, 2013, all counsel of record have been served with a copy of the foregoing via the Court's CM/ECF system, per Local Rule CV-5(a)(3).

/s/ Jennifer P. Ainsworth
Jennifer P. Ainsworth

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that counsel for Defendant Sophos Ltd. has conferred with counsel for Plaintiff Implicit, LLC with regard to this motion and that counsel for Plaintiff has represented that it is not opposed.

/s/ Jennifer P. Ainsworth
Jennifer P. Ainsworth